

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CHMURA ECONOMICS &)
ANALYTICS, LLC,)
v.)
RICHARD LOMBARDO,)
Defendant.)

Case No. 3:19-cv-813-REP

PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY

Plaintiff Chmura Economics & Analytics, LLC, by counsel and pursuant to Fed. R. Civ. P. 26(d), respectfully moves for expedited discovery for the reasons set forth in the accompanying Memorandum. Specifically, Chmura respectfully requests an Order requiring Defendant Richard Lombardo to respond to the discovery requests attached as Exhibit A to its Memorandum within fifteen (15) calendar days of service and permitting Chmura to depose Mr. Lombardo regarding the topics identified in its written discovery within fifteen (15) days of its receipt of the requested documents and interrogatory answers.

Dated: December 9, 2019

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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